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From: Holly Price [<mailto:Holly.Price@noaa.gov>]

Sent: Friday, September 16, 2005 10:15 AM

To: CCRSG Comments

Subject: Evaluation criteria comments

MLPA Initiative Team--

Thanks for the opportunity to provide some initial comments on the matrix for evaluation criteria for existing central coast MPAs-- my main point below elaborates on the one I already raised verbally at the September CCRSG meeting.

In a number of instances, the primary evaluation measure in the matrix is a simple note of whether a certain types of species or habitats are present in the MPA and whether the regulations prohibit take. However, this is not an appropriate measure of whether the species, life history stages, biodiversity, or habitat noted in the objective is actually being protected in any significant way, as assumed by the objective's language. This concern applies to the criteria for the two design considerations re the nearshore and abalone plans, all 5 of the objectives under Goal 1, objectives 1 and 2 under Goal 2, and objectives 4a and 4b under Goal 3.

Actual protection depends on a more complex array of issues, such as whether the MPA is large enough to afford adequate protection, whether it incorporates various depth strata to encompass the life history stages, and various other features which are discussed in the SAT guidelines. The analysis of whether these MPAs meet the protection objectives needs to include an evaluation and acknowledgement of these more complex factors. Where data are not present to directly evaluate whether an MPA has led to increased biomass, density, size, etc, then the MPAs should be discussed relative to the numerous specific recommendations in the SAT guidelines. Where data are present, such as the studies that have been compiled for Hopkins, Big Creek and Point Lobos, then they should be included and referred to to supplement comparisons to SAT guidelines.

These evaluation criteria and the analysis relative to individual MPAs would benefit from a thorough discussion and input from the SAT. While I recognize that the matrix is just an initial attempt, it greatly oversimplifies a complex evaluation and as such can be quite misleading. This is of particular concern if these criteria may also be used not only for evaluating existing MPAs but as success measures during our future design process.

I look forward to discussing this further at the next meeting.

Thanks for the opportunity to comment,

Holly

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